

Local Agency Conference Call

October 6, 2016



Agenda Review

- State Updates:
 - November Webinar
 - WIC Shopper & WIC Smart!
 - WIC Work Group meeting- observers please RSVP
 - Policy updates- SOD & VOC, others later
 - SPIRIT Update- risk codes
 - Immunization policy questions- answered
 - State staffing updates
 - EBT project update
- Monitoring Process Review



Immunizations

- DTaP 4 times in 2 years- check at appts for 0-24 month olds
 - If Cert/MC- do it in the IZ link/tab
 - If follow up appt, note in chart as you will not be in a “guided script”
- Screen & Refer
 - Do not need to know all about IZ schedule or document all, just up to date or not
 - Coordinate with IZ nurse, get access to IZ system or ask for records from parents
- CANNOT deny service if refused, document not brought in

Monitoring Process

- Runs on 2 year cycle
- 3rd 2-year cycle with “new” process- developed with WIC Futures Study Group
 - Scoring, tiers, known finding areas, equitable # of charts reviewed, etc.
- Each 2 year cycle we reviewed process, made some revisions. This year we took a very thorough and comprehensive approach to this process

Process of review

- Question the whole process
 - Each finding area reviewed & discussed
 - Chart review vs. observation reviewed & discussed
 - Reviewed all the forms, streamlined, cleaned up, matched formats & language...
 - Added financial review section
 - Added “teeth” to whole process
 - Adjusted scoring mechanism to better reflect whole process
 - Adjusted tier follow-up requirements to be more fair
 - Ensured process was clearly documented, easy to follow, resources available

Major Changes

- Financial Questionnaire
- Observation areas scored (previously just discussion)
- Pre-monitoring items may be “findings”, previously just FYI/discussion
 - These items will not be scored
- Corrective Actions not required on findings that do not affect score
 - Covered more later...

Today

- Review the flow of the process
- Review all the forms associated with the process
- Review finding areas, other areas of review
- Communicate changes to the process
- Answer your questions!

Scheduling Monitoring Visits

- Identify those agencies due for monitoring
- Propose a day and time, work with local agency to finalize

Official Monitoring Notification

Monitoring Letter:

- Send at least 60 days before the visit
- Confirms days and times
- Sent to WIC contract signer and Director.
- Contains documents to describe the entire monitoring process
- Includes copies of expenditure reports and financial questionnaire

Pre-Monitoring Worksheet

- Completed by State WIC monitoring team
- Intent is to review program areas that cannot be evaluated through on-site observation or chart reviews
- Monitoring staff determines if a finding is warranted or discussion item

Chart Pulls

- State WIC staff will review WIC participant charts for compliance prior to their visit.
- The size of the agency will determine how many charts to review.

Chart Pulls

- **Small Clinics** (0-400 Participants): 8 Charts
- **Medium Clinics** (401-1000 Participants): 16 Charts
- **Large Clinics** (1001-2000 Participants): 32 Charts Reviewed
- **Extra Large Clinics** (>2000 Participants): 40 Charts

Chart Pull Instructions

- The Admin and Nutrition team will review the same charts.
- Charts to be reviewed will be obtained from a random data pull.

Chart Pull Instructions

1. Certified and served within relevant local agency
2. Include at least 2 benefit issuances, preferably more (i.e. certification, follow up and mid-certification)
3. Include all WIC participant categories
4. At least one high-risk chart based on nutrition risk criteria and/or food package III designation



Monitoring process

Financial Review

- The letter will identify which two months of expenditure reports will be reviewed and copies of the selected reports will be included in the pre-monitoring packet. The required supporting documentation must be submitted to the WIC state office 30 days prior to visit date.

Monitoring process

Financial Questionnaire:

- There will also be a WIC Financial Questionnaire included in the pre-monitoring packet. This questionnaire must be completed by someone in the accounting department and will be due to the WIC State office 30 days prior to visit.

Nutrition and Admin Chart Review

- The Nutrition and Admin Teams reviewed all previous finding areas and findings in previous two years
- Finding areas were condensed and clarified
- Now there are 8 chart areas plus observation in each Nutrition and Admin section

Administrative Finding Areas

- Participant Identification
 - Chart has approved proof of ID.
 - Proof of ID scanned is fully legible.
- Authorized Representative Identification
 - Chart has the Auth. Rep. approved proof of ID.
 - Proof of ID scanned is fully legible.

Administrative Finding Areas Continued

- Served Within Timeframe
 - Initial contact date recorded for all new participants.
 - First appointment offered documented in the MIS.
- ❖ For pregnant women and migrant workers, notice must be given within 10 days (unless a request for an extension from the State is requested and approved).
- ❖ All other applicants must be given notice within 20 days.

Administrative Finding Areas Continued

- Income Documentation/Adjunctive Eligibility (SIS)
 - Approved Proof of Income scanned on file.
 - Zero income form used properly.
 - Adequate proof of income on file (ex: 30 days of income provided).

Administrative Finding Areas Continued

- Income Documentation/Adjunctive Eligibility (SIS) Cont'd
 - Chart indicates adjunctive eligibility; and the participant has been SIS'd for the current certification period, or provided proof of eligibility letter.
 - Exempted from proof of income requirements with tribal ID corresponding to issuing tribal agency and their reported income is not higher than the IEG (if participant reports above, LA must verify income with other proof).

Administrative Finding Areas Continued

- End of Certification/Ineligibility Notice
 - Official notification of cert end and/or ineligibility is documented (not missing) in the participant chart.
 - EOC issued at least 15 days before each certification end.
- Confidentiality/ Integrity
 - LA staff maintains confidentiality regarding a participant and/or family member verbally or in writing.

Administrative Finding Areas Continued

- Residence Documentation
 - Proof of physical residence on file; reservation programs may use a mailing address.
 - Proof of residence documented matches scanned documentation.
 - Proof of residence scanned is fully legible.

Administrative Finding Areas

Continued

- VOC Process
 - Authorized VOC documents are scanned into the participants' chart.
 - Required information is included in incoming VOC documents: name, certification date, and certification end date.

Nutrition Finding Areas

- Risk Code Assignment:
 - All possible risk codes are assigned at each certification
 - Back up documentation is provided, if needed
 - Risk codes are not removed if CPA (C) assigned
 - Follow up on risk codes are updated (i.e. resolved, working on, etc.)

Nutrition Finding Areas Continued

- Participant Referral and Follow up
 - A referral is required at each certification
 - If no referral is made, it must be documented why
 - High Risk referrals must be made according to High Risk Table
 - Follow up on referrals must be documented at subsequent visits

Nutrition Finding Areas Continued

- Food Package
 - Assignment of correct/proper package
 - CPA will assign and make changes as needed
 - CPA/RD will approve FP III
 - Issuance of benefits
 - Looking at over/under issuance or wrong food packages
 - Tailoring food package
 - Issuing less than full amount
 - Change in formula
 - Issuance of alternate milk base
 - Food items that require prescription
 - Issuance of RTF formula



Nutrition Finding Areas Continued

- Documentation of Breastfeeding and/or Nutrition Education
 - Core Education Topics
 - At least 4 contacts will be made per 1 year, 2 contacts per 6 months
 - Made quarterly or with each set of benefits issued
 - Education documentation must be clear and include what information was provided



Nutrition Finding Areas Continued

- Anthropometric/Hematological Measures
 - Must be collected according to policy
 - Infants hgb before 1st birthday
 - Follow up as indicated per policy

Nutrition Finding Areas Continued

- Goal Established and Follow Up
 - A participant stated goal will be documented at each certification
 - If denied, must document
 - Follow up must be documented at subsequent visits

Nutrition Finding Areas Continued

- Nutrition Assessment Questions
 - Category appropriate nutrition assessment questions complete at certification and mid-certification
 - All questions must have a response
 - Referral to other areas not acceptable

Nutrition Finding Areas Continued

- Nutrition Care Plan
 - Must be completed at certification and mid-certification
 - At minimum the plan will include:
 - Type of follow up appointment
 - Timing is not the recommended 3 months
 - Potential or relevant education topics
 - Follow up needed at next appointment

Nutrition and Admin Forms

- Nutrition and Admin Chart Review Form
 - One page
 - Available online and in State Plan 2017
- Nutrition and Admin Chart Review Findings
 - Complete description of all finding areas and expectations
 - References for each finding area in the state plan
 - Available online and in State Plan 2017

Nutrition and Admin Forms Examples

- Bring up for review:
 - Admin
 - Chart Form
 - Chart Review Findings
 - Nutrition
 - Chart Form
 - Chart Review Findings

On-Site Review

- Usually 1 day
 - If more than 5 clinics, will visit 2 (20% required)
- Schedule variety of appointments to observe
 - State staff will follow appointments start to finish
 - Interview staff, discuss processes
 - Check logs, equipment, etc.
- Entrance interview in the morning (quick)
 - Just introductions, review activities for the day
- Exit interview at end of day (discuss later)

Observation

Participant Appointment (scored):

- Certification Procedures
- Served within Timeframe
- Voter Registration Procedures
- Anthropometrics
- Bloodwork
- Food Package
- Required Education
- Rights & Responsibilities

Observation

Observation- Clinic Operations (scored):

- Training
- Nutrition Education Materials
- Breastfeeding
- Pump Program
- Civil Rights
- Outreach Plans
- Benefit Management
- Posters/Signage

Observation

Observation- Overall Clinic (not scored):

- Clinic Environment
- Employee Integrity
- Separation of Duties
- IEG Available/Posted
- No-Show Policy
- Appointment Scheduling
- Clinic Signage
- Review Self-Monitoring
- VENA

Exit Interview

- Ensure all relevant staff are there
- Will review chart findings, observations, pre-monitoring items
- This is preliminary and will not tell you score or tier
- Opportunity for questions, clarifications

Monitoring Report

- Sent within 30 days from monitoring visit
- Comprehensive, clear listing of findings
 - including chart numbers, certification dates, need for corrective action, score, tier
- List of observations, discussion topics
- Positive feedback
- Information about next steps

Monitoring Scoring-Tier 1 ($\geq 80\%$)

- Great job! This is the highest tier and indicates that the clinic is generally operating according to policy
- Self-monitoring is required to be completed at the local level using State forms and processes the following year.
 - Results of this monitoring will be reviewed at the next State monitoring visit.

Monitoring Scoring-Tier 2 (65-79%)

- Self-chart reviews are required on 8 charts at 6, 9 and 12 months after monitoring visit
 - Charts to be reviewed will be sent by State staff ahead of due date
- Letter will be sent to LA after last self-monitoring
 - Summarize progress, outline outstanding issues
- Progress should be seen throughout the year.
 - If there are significant concerns after the 3 self reviews, a meeting will be set up to discuss.

Monitoring-Tier 3 ($\leq 65\%$)

- This indicates significant issues with compliance and program quality.
- Verification of CAP completion must be submitted to State Office within 60 days of approval
- Self-chart reviews are required on 8 charts at 6 and 9 months after monitoring visit
 - Charts to be reviewed will be sent by State staff ahead of due date
- Full monitoring will be completed by state at 12 months
- Agency will stay on regular monitoring cycle
 - So in this case they will have 3 consecutive annual monitorings by the State

Scores

- 80% based on chart review
- 20% based on observation
- “Forgiveness factor”
 - 1 for small, 2 for medium, etc.
 - If 1 finding in 8 charts is noted, your score is not impacted and you do not have to address in CAP
 - This is just a human error thing, not a trend
- Also considers number of charts with findings and number of finding areas
- Example

Follow-up Procedures

- CAP developed by local agency and submitted within 30 days of report
 - Maintain documentation of completion on-site
 - Each finding “area” must be addressed (i.e. not each chart finding)
- CAP will be approved or denied by State within 30 days

Corrective Action Plan- Examples

- State Plan policy review
- SPIRIT modules (if relevant)
- Attend New Employee Training
- Internal activities- quality improvement measures
 - Cheat sheet development
 - Peer review
 - In-service training
- Note: CAP must be relevant to finding area

Wrap Up

- State Plan chapter 2, policy 10 (2.10) revised completely (outline of process)
- All forms are now attached to State Plan
- All forms also available online
- See website for tier specific guidance
- Ask State Staff if you are unclear about any aspect of your monitoring experience!

Questions?

